

West Lake Landfill Community Dialogue March 2, 2016 Meeting Summary

Welcome and Introductions

Facilitator Cindy Cook welcomed everyone. She noted that the purpose of this and future Community Dialogue Meetings is to discuss the cleanup approach for the radiological waste at the West Lake Landfill Superfund Site that is referred to as "OU1". While the dialogue process is not an agreement or consensus-seeking process, EPA will listen intently to individuals' comments during the dialogue meetings and will consider these individual comments as it selects its preferred alternative for OU1.

Cindy then asked that participants introduce themselves. The following groups were represented:

- Community Residents
- The West Lake Landfill Community Advisory Group (CAG)
- Senator Blunt's Office
- Senator McCaskill's Office
- Congressman Clay's Office
- Congressman Wagner's Office
- Pattonville School District
- Saint Louis County Department of Public Health
- Saint Louis County Emergency Management
- DePaul Hospital
- The Federal Aviation Administration (FAA)
- Saint Louis Airport Authority
- One of the PRP's, represented by Don Ridenhower
- North County Chamber of Commerce
- Missouri Coalition for the Environment (MCE)
- Missouri Attorney General's Office
- Missouri Department of Natural Resources (MDNR)
- EPA Region 7

Cindy noted that the meeting would be videotaped. A link to the video –which will be posted on YouTube – will be posted on EPA's website.

http://www3.epa.gov/region07/cleanup/west_lake_landfill

She also encouraged participants to fill out a contact card, and EPA will add the information to their contact list. Those readers who did not attend the meeting can request that they be added to the list by contacting Ben Washburn, Washburn.ben@epa.gov.

Opening Remarks

EPA Region 7 Superfund Director Mary Peterson welcomed the group and extended Regional Mark Hague's regards.

Mary stated that EPA is convening this dialogue regarding the cleanup approach for the radiological waste in OU1 to:

- improve two-way communication,
- hear community comments and concerns,
- provide information so that stakeholders will be in the best position for meaningful participation in the public comment period for the OU1 remedy decision.

Mary began her role as Superfund Director about a year ago. She has made staffing changes to advance progress on West Lake site, because it was clear to her that while Project Manager Brad Vann is doing a great job, the Westlake Site is too complicated for any one person to handle. Mary added three additional project managers to the team (Tom Mahler, Justin Barker, and Andrew Gieseke), and expanded the role of Lynn Juett (Chief of EPA's Missouri/Kansas Remedial Branch) on the project.

Mary also commented that of course EPA is aware of the effort to transfer jurisdiction over the Westlake site from Superfund to FUSRAP and the Army Corps of Engineers. Mary explained that EPA takes its responsibility to remediate the Westlake site seriously, and will remain focused on the work ahead.

Discussion: Community's Information Needs

Participants made the following comments regarding their need for information:

- The success of future meetings is directly affected by how willing EPA is to share information prior to making decisions.
- Dialogue participants need access to key stakeholders--including MDNR.
- Future meetings should include information about ongoing and completed studies -- especially information regarding human health.
- Give us better notification of future meetings. Suggestions for doing this included posting fliers in community centers, and sending US mail notifications to those who do not have e-mail.
- Share information as soon as possible, don't wait until final decision. Release approved work plans. Post updates on work progress and other activities.
- People need sufficient time to review and comment on technical reports, including the Remedial Investigation (RI) and Feasibility Study (FS) amendments.

Overview of the Superfund Process

Technical Assistance Services for Communities Program (TASC) Contractor Terrie Boguski gave a "Superfund 101" presentation regarding how the Superfund process works.

Site Update

Terrie Boguski also presented a site update. Terrie's slides for both the Superfund overview and the site update are available at http://www3.epa.gov/region07/cleanup/west_lake_landfill/

Terri explained that part of her role is to provide an objective review of technical documents for the CAG and other community groups. Terri noted that it typically takes her approximately two weeks to review technical documents such as a Remedial Investigation or a Feasibility Study and to provide her comments to the community.

EPA prepared a poster board with a timeline of milestones regarding each of the major initiatives at the site:

1. the cleanup of the radiological material (OU1)
2. the isolation barrier
3. the surface fire mitigation work, and
4. Groundwater assessment (OU3)

This timeline is available at http://www3.epa.gov/region07/cleanup/west_lake_landfill/

Questions and Discussion

Participants were invited to pose questions to EPA's responses are pasted below.

1. Does EPA have a cleanup plan for the site, or is it just a cap?

EPA is currently reevaluating the 2008 Record of Decision (ROD). EPA has not yet made any decision on a revised remedy for the site. EPA will propose any revised remedy decision for public comment by the end of 2016.

2. When will the work on the isolation barrier begin and be completed?

The exact duration of the construction will be contingent upon the details and complexities of the approved design, but field efforts will begin within six months from the time EPA's Action Memorandum is signed. Planning for the construction has identified multiple items related to this effort, including the physical barrier, engineering controls and other features to help ensure RIM remains isolated from the effects of a SSE.

3. How and when does EPA communicate with MDNR regarding the site?

EPA and MDNR hold regular, bi-weekly, conference calls to discuss the site. In addition to these bi-weekly calls, EPA and MDNR often communicate almost on a daily basis about specific actions at the site, both state lead and federal lead.

4. Have any health studies been done on the effects of the site on the surrounding community?

The Agency for Toxic Substances and Disease Registry (ATSDR) released a Health Consultation in the Fall of 2015 that provides a confirmation of EPA's previous findings that there are currently no significant off-site health risks to the community that are attributable to the site. That report is available online: http://www3.epa.gov/region07/cleanup/west_lake_landfill/pdf/west-lake-hc-eval-ou1.pdf

5. Can EPA identify what information and documents will be used to make the remedy

decision (data and analysis, risk information, RI, FS, etc.) and make them available in advance of the Dialogue Meetings when you will discuss the different options? We need to read them to be able to discuss the options.

EPA will use data and information collected as part of investigations conducted since the 2008 ROD. This information will be summarized in a Remedial Investigation Addendum (RI Addendum) report which is expected to be released in the fall 2016. In addition, a Final Feasibility Study (FFS) will describe and evaluate site-specific cleanup alternatives, and will also be used to support the final remedy decision. There are many other technical documents available for review on EPA's West Lake Landfill website in the Site Documents section:

http://www3.epa.gov/region07/cleanup/west_lake_landfill/document-archive.htm#SiteDocs

6. Can EPA release approved work plans and post updates of on-site activities?

EPA provides approved work plans and other site-related documents to the public on its West Lake Landfill website in the Site Documents section. EPA reviews these reports to ensure the information regarding the site is accurate, and is scientifically supported by the data. Please see web-link below for archived documents for the site:

http://www3.epa.gov/region07/cleanup/west_lake_landfill/document-archive.htm#SiteDocs

The Administrative Record also contains site-related documents and is available locally at the Bridgeton Trails Branch of the St. Louis County Public Library.

EPA posts regular updates of site activities on its West Lake Landfill website and also to its West Lake Facebook and Twitter pages:

https://www3.epa.gov/region07/cleanup/west_lake_landfill/index.htm

<https://www.facebook.com/WestLakeLandfillSuperfundSite/> <https://twitter.com/WestLakeSite>

7. Can EPA create a map showing where the Subsurface Smoldering Event is located?

The subsurface smoldering event (SSE) is monitored and managed under the regulatory authority of the Missouri Department of Natural Resources (MDNR). All information related to oversight and monitoring of the Bridgeton Landfill is posted on their website (<http://dnr.mo.gov/bridgeton/>). EPA has also enlisted the support of our Office of Research and Development (ORD) in examining the SSE monitoring data, which is also available on MDNR's website.

8. How can EPA make a remedy decision according to your timeline just one month after getting the Remedial Investigation and Feasibility Study in the fall of 2016?

EPA is and will be reviewing various draft components and data that will support the RI Addendum and subsequent FFS. Therefore, while the delivery of the final RI Addendum and FFS documents are scheduled to be finalized about a month apart, many of the data elements (existing and being generated from recent additional investigations) will have already been reviewed and approved for inclusion in these documents. This information and data will be publicly available once the reports have been approved by EPA.

9. After these complex documents are completed can you have Terrie Boguski (TASC) review and summarize them for the entire community?

Yes, the documents will be available for review by TASC. EPA funds TASC and is supportive of Terrie's role in interpreting complex site information for the community.

10. What is EPA's plan if the subsurface smoldering event accelerates? Is there a contingency plan?

EPA is currently in discussions with the PRPs regarding implementation of a series of engineering controls to ensure an SSE does not come in contact with the RIM associated within OU1, Area 1. The result of these discussions is not yet complete but will be made publicly available once final. It is EPA's intent to ensure that regardless of the SSE's location, measures will be taken to address this concern.

11. Why stop short of full vegetative clearing as part of surface fire mitigation?

Removing vegetation in areas where RIM has been identified as at or near the surface is underway as a time critical removal action to reduce risks associated with a surface fire. Other site vegetation, while perceived as a nuisance, protects the landfill surface from erosion until the permanent remedy can be implemented. Planning for sampling of the remaining vegetation is currently underway. It is currently anticipated that the remaining site vegetation will be removed from OU1 during implementation of the final remedy.

12. Who are the Potentially Responsible Parties?

The Potentially Responsible Parties identified for the site are Bridgeton Landfill LLC, Rock Road Industries, Cotter Corporation, and the Department of Energy.

13. How can you increase transparency on your interactions with the PRPs?

EPA is committed to transparency, and will continue to release information about the work being performed by the PRPs at the Site. EPA will also continue to routinely meet with members of the community, release final approved documents, and communicate on the site via our website and on social media outlets to better support our on-going transparency efforts.

14. If MDNR is in charge of the underground fire (subsurface smoldering event) in the Bridgeton Landfill where can I see MDNR's information on their air quality testing?

The MDNR maintains a web page with site information including web-links to the air sampling and monitoring reports for the Bridgeton Sanitary Landfill. The MDNR web page with links to the air data can be accessed at: <http://dnr.mo.gov/bridgeton/>

15. Since MDNR is responsible for the Bridgeton Landfill have you tested for the absence of RIM in the South Quarry?

Initial results from the historical review in the Phase I investigation indicate there is no evidence of RIM impacted areas that warrant further investigation within the former North or South Quarry. MDNR is responsible for monitoring the subsurface smoldering event and for managing the Bridgeton Landfill and EPA is responsible for radiologically impacted material (RIM). Under EPA's oversight and approval authority, PRPs are working to finalize the Phase 1 Comprehensive Report for OU-1 that will identify extent of the radiological contamination encountered in the Area 1 investigation. An earlier phase of this field work did extend into a portion of the North Quarry but did not encounter RIM.

16. Please share as much information as possible about your plans to split off groundwater as a separate project you are calling Operable Unit 3.

EPA will require additional groundwater evaluations on and off site to determine the nature and extent of contaminants identified in and around the West Lake site, and develop an

evaluation that supports whether there is a need for a future and separate groundwater remedial action. EPA will publicly post the OU-3 related documents once finalized.

17. How are families currently impacted by the RIM contamination?

The Agency for Toxic Substances and Disease Registry (ATSDR) released a Health Consultation in Fall 2015 that provides a confirmation of EPA's previous findings that there are currently no significant off-site health risks to the community that are attributable to the site. That report is available online: http://www3.epa.gov/region07/cleanup/west_lake_landfill/pdf/west-lake-hc-eval-ou1.pdf

Based on on-site and off-site monitoring performed to date, EPA has determined that there is no significant off-site health risks posed by wastes contained at the site. EPA continues to monitor the site and surrounding areas for evidence of impacts, or potential threats to the surrounding communities.

What We Heard in Our Interviews and Process Recommendations

Summary of Interviews

Cindy Cook stated that she and co-facilitator Dain Maddox have been hired by EPA to facilitate dialogue with the community regarding the cleanup approach for the radiological material (OU1) at the West Lake Landfill. She and Dain are impartial third parties who are working for all parties. Their role is to ensure that the conversation is inclusive, respectful and transparent, and that it is a useful and productive one for all.

Cindy noted that when EPA asked her to design a dialogue process, she responded that she wanted to get input from as many stakeholders as possible and to consult with the West Lake Community Advisory Group (WL CAG) before designing the process.

Cindy and Dain interviewed over 50 people and met with CAG leadership several times. They asked everyone they spoke with who else they should interview, and noted that if anyone present tonight has ideas regarding people they should interview, she welcomes their suggestions. Cindy and Dain are committed to designing and facilitating a process that complements the work of the Community Advisory Group, and that provides everyone who is interested an opportunity to converse in a respectful and productive manner.

Cindy briefly summarized what she and Dain heard in their interviews. She noted that they encountered a high level of mistrust and impatience with EPA, and a concern that the dialogue process might be simply a PR move on EPA's part, or an attempt to prevent the site from being moved to the FUSRAP process. She noted that it was clear that the dialogue process would only work if it is designed so that it is agnostic regarding where jurisdiction over the site should rest.

She went on to note that people are impatient: they want to get the cleanup completed as soon as possible. The people interviewed also would like significantly better communication regarding what's happening with the cleanup.

She observed that everyone interviewed—and indeed everyone connected with the site—share

a common goal: a cleanup that protects the community and that is completed with all deliberate speed. She observed that while this shared goal may be obvious, it might be helpful to keep this in mind during the course of cleanup discussions. She concluded by noting that most of the people she interviewed were cautiously optimistic regarding this dialogue process -- that sitting down together to talk has significant potential.

Recommendations

Cindy noted that after completing the interviews, she and Dain concluded that regular community dialogue could significantly improve communication --particularly if the dialogue process is augmented by regular --perhaps bi-weekly-- site updates from EPA between dialogue meetings.

Cindy stated that the community dialogue meetings will be open to the public. She described the challenge of designing a process regarding a complex and controversial site with a large number of interested parties, since productive and respectful dialogue means that only one person is speaking at any given time. She suggested that during the dialogue process it might be helpful to have a table set for 25 to 35 people with at least one representative of each interest group seated at the table, and the remaining participants seated in concentric circles around the dialogue table.

Potential Meeting Topics

Cindy noted that she asked EPA to prepare a list of possible dialogue meeting topics for everyone's consideration. This list is provided below.

March 2 Meeting:	Formative Meeting Overview of Superfund Process Site Update
Meeting 2:	Community involvement and remedy selection process Site Update
Meeting 3:	In-Depth Discussion re Remedy Alternatives Cap-in-Place Site Update
Meeting 4:	In-Depth Discussion re Remedy Alternatives Partial Excavation Full Excavation Site Update
Meeting 5 (optional):	Recap How to Participate in Formal Public Comment Period Site Update

Participants generally reacted favorably to this proposed list, and reiterated their comments that for the dialogue process to be productive, it must include key parties, and that EPA must be willing to make site information public as soon as it is able to do so.

Discussion and Next Steps

Cindy Cook requested comments from meeting participants regarding the process recommendations. No one present raised any concerns.

Cindy reviewed the following next steps:

Meeting Summary

Within a week, Cindy will prepare a draft meeting summary and circulate it to participants for review and comment. She will incorporate any non-controversial edits. If any proposed changes are likely to be of interest to others, she will circulate them for discussion by e-mail. Once any issues are resolved, she will prepare and circulate a final meeting summary.

EPA Responses to Questions

EPA will make every effort to prepare responses to questions posed at this meeting, and circulate the responses by March 16.

Next Meeting

The next dialogue meeting will likely be in mid to late April. Cindy or EPA will circulate notice of the next meeting date as far in advance as possible, and will post information regarding the meeting on community bulletin boards, as requested.

If you have questions or comments about the community dialogue process, please contact Facilitator Cindy Cook, 802-223-1330, ccook@adamantaccord.com